CHRISTOPHER CHIOU 1 Acting United States Attorney 2 District of Nevada Nevada Bar Number 14853 3 SKYLER H. PEARSON Assistant United States Attorney 501 Las Vegas Blvd. So., Suite 1100 5 Las Vegas, Nevada 89101 (702) 388-6336 skyler.pearson@usdoj.gov 6 7 Attorneys for the United States 8 UNITED STATES DISTRICT COURT 9 **DISTRICT OF NEVADA** 10 Case No. 2:21-cv-00470-APG-VC 11 Ramiro J. Cuadra, 12 Plaintiff, 13 Joint Status Report and Request to v. Continue the Stay of the Proceedings 14 Alejandro Mayorkas, in his official capacity An Additional 60 Days as acting Secretary of Homeland Security; 15 U.S. Department of Homeland Security; Tracy Renaud, in her official capacity as 16 acting Director of U.S. Citizenship and Immigration Services; U.S. Citizenship and 17 Immigration Services; the United States of America; and John Does I through XX, 18 inclusive, 19 Defendants. 20 21 The parties, by and through their respective counsel, hereby file this joint status 22 report and stipulate and jointly move the Court to continue to stay all deadlines an 23 additional 60 days in this matter based on the following: 24 1. On March 23, 2021, Plaintiff filed his Complaint for Relief in the Nature of 25 Mandamus (ECF No. 1), requesting, among other things, that the Court issue a Writ of 26 Mandamus compelling the United States Citizenship and Immigration Services ("USCIS") 27 to adjudicate Plaintiff's I-485 application. 28

The deadline for the Federal Defendants to answer or otherwise plead was

3 3. On June 8, 2021, the parties stipulated to stay this case's proceedings (ECF No. 7). As part of the stipulation, the parties agreed to provide the Court with a joint status 4 5 report 90 days after the entry of the Court's stay order (ECF No. 7 at 2). 6 4. On June 9, 2021, the Court granted the parties' stipulation (ECF No. 8). 7 5. On September 7, 2021, the parties filed a joint status report and requested an 8 additional 60 days due to Plaintiff's relocation from Las Vegas to Reno (ECF No. 9). 9 6. Since the Court granted the parties stipulation to extend an additional 60 10 days (ECF No. 10), USCIS scheduled and held an interview for Plaintiff on Plaintiff's I-485 11 application. 12 7. The USCIS's interview may result in resolution of some or all of the issues 13 raised in the complaint. 14 8. Accordingly, the parties request that the Court continue to stay this matter 15 pending resolution or final adjudication of Plaintiff's I-485 application. If the parties are 16 able to resolve this matter, they will promptly file a stipulation of dismissal. 17 /// 18 /// 19 /// 20 /// 21 /// 22 /// 23 /// 24 /// 25 /// 26 /// 27 /// 28 ///

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June 23, 2021 (ECF No. 6).

1 9. If the parties are unable to resolve this matter and the case is not dismissed, 2 the parties agree to file another joint status report 60 days after the entry of the Court's 3 order on this stipulation. 4 Respectfully submitted this 8th day of November 2021. 5 CHRISTOPHER CHIOU 6 REZA ATHARI & ASSOCIATES Acting United States Attorney 7 <u>/s/ Skyler H. Pearson</u> SKYLER H. PEARSON /s/ Luther Snavely 8 LUTHER SNAVELY 3365 Pepper Lane, Suite 102 Assistant United States Attorney 9 Las Vegas, Nevada 89120 Attorneys for the United States Attorney for Plaintiff 10 11 IT IS SO ORDERED: 12 13 14 UNITED STATES DISTRICT JUDGE 15 DATED: November 9, 2021 16 17 18 19 20 21 22 23 24 25 26 27 28